

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: BRUCE L. LEBITZ)	CHAPTER 13
HEIDI L. LEBITZ)	
DEBTORS)	CASE NO. 1:21-bk-02417
)	
FORD MOTOR CREDIT COMPANY)	
MOVANT)	
)	
BRUCE L. LEBITZ)	
HEIDI L. LEBITZ)	
RESPONDENTS)	
)	
JACK N. ZAHAROPOULOS, TRUSTEE)	

**DEBTORS' RESPONSE TO FORD MOTOR CREDIT COMPANY'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO
BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, Ford Motor Credit Company, filed its Motion for Relief from Stay on June 3, 2022.
2. Debtors acknowledge some auto loan payments are past due.
3. Debtors desire the opportunity to cure any post-petition arrears and keep their automobile.
4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtors, Bruce L. Lebitz and Heidi L. Lebitz, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed June 3, 2022 by Ford Motor Credit Company.

Dated: June 3, 2022

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